



Mark C. Moore
Member

May 2, 2022

VIA ELECTRONIC FILING

The Honorable Toby J. Heytens, United States Circuit Judge
The Honorable Margaret B. Seymour, Senior United States District Judge
The Honorable Richard M. Gergel, United States District Judge

Re: Submission of Privileged Documents for In Camera Review—The South Carolina State Conference of the NAACP and Taiwan Scott v. Thomas C. Alexander, et al., Civil Action No. 3:21-cv-03302-MBS-TJH-RMG

Dear Judge Heytens, Judge Seymour, and Judge Gergel:

Simultaneous with this filing, the House Defendants submit 17 privileged email communications (with 10 attachments for a total of 27 documents) between outside counsel and Defendant Chairman Murphy. The House Defendants believe and assert that the submitted communications are protected by the attorney-client privilege. However, because Plaintiffs have taken issue with outside counsel's involvement in this case, the House Defendants submit the communications to the Court for *an in camera* review out of an abundance of caution.

The House Defendants are submitting these documents to the Court today because Chairman Murphy's deposition is scheduled for Wednesday, May 4th at 10:00 a.m. If the Panel needs any additional information from the House Defendants, please let us know.

Respectfully submitted,

A handwritten signature in blue ink that reads "Mark C. Moore". The signature is fluid and cursive, with the first and last names being more prominent.

Mark C. Moore

Austin
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Greenville
Bluffton / Hilton Head
Myrtle Beach
Raleigh